

**In The Matter Of:**  
*Melinda and Mark Loe, et al vs.*  
*Willie Jett, et al*

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*MELINDA LOE*  
*February 9, 2024*  
*Melinda Loe - 2-9-24*

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*Shaddix & Associates*  
*7400 Lyndale Avenue South*  
*Suite 190*  
*Richfield, MN 55423*

Page 1

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF MINNESOTA  
3 -----  
4 Melinda and Mark Loe, on their  
5 own behalf and as next friends  
6 of their children R.L. and O.L.;  
7 Dawn Erickson, on her own behalf  
8 and as next friend of her child  
9 J.G.; Crown College; and  
10 University of Northwestern  
11 St. Paul,  
12  
13 Plaintiffs,  
14  
15 vs. Case No. 23-CV-1527  
16 (NEB/JFD)  
17 Willie Jett, in his official  
18 capacity as Minnesota  
19 Commissioner of Education;  
20 and Minnesota Department of  
21 Education,  
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23 Defendants.  
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Page 5

1 Q. Number one, this is not a marathon, so if you need  
2 to take a break at any point, just tell me.  
3 **A. Okay. Will do.**  
4 Q. We'll probably take breaks about every hour. I  
5 don't think we'll be here that long today.  
6 **A. Okay.**  
7 Q. Number two, I'm not trying to trick you, so if I  
8 ask a bad question, and lawyers do that a lot, just  
9 tell me you don't understand what I was asking and  
10 I'll try to ask it in a better way. Okay?  
11 **A. Okay.**  
12 Q. Number three is, if you remember something later in  
13 the day that relates to an answer or something that  
14 I asked earlier, we can stop and we can go back and  
15 talk about that again. Okay?  
16 **A. Okay.**  
17 Q. Number four is, I don't want to know anything that  
18 you've talked about with your lawyers. I don't get  
19 to know that and I don't want to know that. And so  
20 any conversations you were a part of where your  
21 lawyers were also present at, I'm not trying to ask  
22 about those.  
23 I'm sure your lawyers will jump in and  
24 stop you from answering anyway, but just know that  
25 if your answer -- answering would require you to

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1 disclose that, you can just say I can't answer that  
2 without --  
3 **A. Okay.**  
4 Q. I'm sure I'll think of other ground rules as we move  
5 forward, but those are the big ones.  
6 **A. Okay.**  
7 Q. Oh, I guess another big one is talking over each  
8 other. That's easy to do. We have a court reporter  
9 and she's taking everything down. If you let me  
10 try and finish my questions, I'll try and let you  
11 finish your answers. Okay?  
12 **A. Sounds good.**  
13 Q. And also, I do this a lot, but if you could refrain  
14 from answering questions, you know, by shaking your  
15 head or saying ah-ha, that's just easier for the  
16 court reporter if we can avoid that. Okay?  
17 **A. Okay.**  
18 **COURT REPORTER:** And I'll just chime  
19 in that you need to speak a little bit louder so  
20 everybody in the room can hear you.  
21 **THE WITNESS:** Okay. Will do.  
22 Q. So let's talk a little bit about you. Where do you  
23 currently reside?  
24 **A. I live in Excelsior, Minnesota.**  
25 Q. Where are you from originally?

Page 7

1 **A. I was born and raised in Minnesota.**  
2 Q. In the Twin Cities metro?  
3 **A. Ugh-ugh. I was born in Cottonwood, Minnesota.**  
4 Q. I'm not a native Minnesotan, so where is Cottonwood  
5 at?  
6 **A. It's in southwestern Minnesota.**  
7 Q. Where did you attend high school?  
8 **A. I went to Lakeview High School.**  
9 Q. Is that a public school?  
10 **A. Yes.**  
11 Q. And did you go on to college after high school?  
12 **A. Yes, I did.**  
13 Q. Where did you go to college?  
14 **A. I went to Bethel College.**  
15 Q. And when did you graduate from Bethel?  
16 **A. I graduated in 1999.**  
17 Q. Me too.  
18 **A. All right.**  
19 Q. Let's see. Bethel. What was your degree in?  
20 **A. I have a bachelor's degree in family and child**  
21 **development.**  
22 Q. And did you go on after Bethel to get a graduate  
23 degree?  
24 **A. No, I did not.**  
25 Q. Okay. Did you do -- I'm going to be using the

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1 word PSEO today to refer to Minnesota's  
2 Post-Secondary Enrollment Options program. Okay?  
3 **A. Okay.**  
4 Q. Did you do PSEO while you were in high school?  
5 **A. I did not do PSEO in high school. There were**  
6 **college credits offered at my high school, but I do**  
7 **not think they were called PSEO.**  
8 Q. Okay. So I know there is a program where college  
9 credits can be taught in high schools. Did you  
10 participate in that program?  
11 **A. I think that's what that was, yes.**  
12 Q. Okay. And do you know, was it a college teacher  
13 who came in and taught those courses?  
14 **A. No, they were high school teachers.**  
15 Q. High school teachers. And did you get college  
16 credit for those courses?  
17 **A. Yes, I did.**  
18 Q. I realize it's been a while since high school, but  
19 do you remember the courses that you took, just  
20 generally, through the -- just specifically the ones  
21 that were part of this dual enrollment.  
22 **A. I remember there was a math class, English. I think**  
23 **like a voice class. I don't remember any others**  
24 **besides that.**  
25 Q. And I know sometimes high schools will offer college

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1 credits at the high school through agreements or  
2 partnerships with colleges. Was there a particular  
3 college that came in and -- or worked with your  
4 high school at Lakeview to provide those courses?  
5 **A. It was partnered with -- I think at the time it was**  
6 **called Southwest State University. I think it has**  
7 **a different name now.**  
8 Q. And were you able to take those credits that you  
9 earned and then use them when you got to Bethel?  
10 **A. Yes, I did.**  
11 Q. Great. And how was that experience? Was it a good  
12 experience for you?  
13 **A. As I recall, yeah, it was something really great or**  
14 **bad about it. It was fun.**  
15 Q. And do you know, were there students of other  
16 faiths who were taking those classes with you?  
17 **A. I have no idea.**  
18 Q. Do you recall any other kids who took the classes  
19 with you?  
20 **A. A couple maybe.**  
21 Q. Okay. Were any of the students who took the  
22 classes with you gay or lesbian that you know of?  
23 **A. I have no idea.**  
24 Q. So after 1999, you graduate from Bethel with a  
25 degree in family and child development.

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1 **A. Um-uhm.**  
2 Q. Did you go to work immediately?  
3 **A. I did.**  
4 Q. Where did you work at coming out of college?  
5 **A. I worked as a parent educator for ECC, and I taught**  
6 **preschool.**  
7 Q. Through the ECFE program?  
8 **A. Yes, it was parent educator with ECC.**  
9 Q. It's a great program.  
10 **A. It is.**  
11 Q. Where did you teach preschool?  
12 **A. I taught preschool in a private home-based**  
13 **preschool. Several families hired me to teach their**  
14 **kids.**  
15 Q. How long did you do that for?  
16 **A. A couple of years.**  
17 Q. And what did you do next?  
18 **A. I became a mom.**  
19 Q. And were you a stay-at-home mom?  
20 **A. Um-uhm.**  
21 **COURT REPORTER:** Just remember to  
22 answer out loud.  
23 **A. Oh, sorry. Yes.**  
24 Q. And are you still a stay-at-home mom?  
25 **A. Yes, I am.**

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1 Q. And just so you know, we're going to talk about  
2 your children today, but we'll be redacting some  
3 information that's sensitive.  
4 So how many children do you have?  
5 **A. I have seven children.**  
6 Q. And could you just start from the oldest to the  
7 youngest and tell me their names and ages?  
8 **A. Sure thing. G.L. is 23. J.L. is 20.**  
9 Q. Okay.  
10 **A. R.L. is 17, O.L. is 14. S.L. is forever 11. E.L.**  
11 **is 9. No, no. I'm sorry. He's -- he's 11. And**  
12 **J.L. is about to turn nine. She's 8.**  
13 Q. And I know there were some initials used in the  
14 Complaint in this case. R.L., I presume that  
15 refers to R.L.?  
16 **A. Yes.**  
17 Q. And O.L. would refer to O.L.?  
18 **A. Yes.**  
19 Q. And did G.L. do PSEO when she was in high school?  
20 **A. Yes, she did.**  
21 Q. Where did G.L. do PSEO at?  
22 **A. At Crown College.**  
23 Q. And do you know what years in high school she was  
24 when she did PSEO at Crown?  
25 **A. She was a junior and a senior.**

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1 Q. And did she do the online classes or did she do the  
2 in-person classes?  
3 **A. She was in person.**  
4 Q. On campus?  
5 **A. On campus at Crown College.**  
6 Q. How close is St. Bonifacius to Excelsior?  
7 **A. It's pretty close.**  
8 Q. Was that one of the factors that you considered in  
9 determining if Crown was a good fit for PSEO?  
10 **A. It was one of several.**  
11 Q. And did G.L. go on to do undergraduate studies from  
12 there?  
13 **A. No, she did not.**  
14 Q. And J.L., did J.L. do PSEO?  
15 **A. Yes, he did.**  
16 Q. Where did J.L. do PSEO?  
17 **A. He did PSEO at Northwestern.**  
18 Q. And for J.L., do you know, did he do it his junior  
19 and senior years?  
20 **A. Yes, he did.**  
21 Q. And do you know, did he do online courses or did he  
22 do in person on campus too?  
23 **A. He did a mixture of both.**  
24 Q. And has J.L. gone on to college?  
25 **A. Yes, he has.**

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1 Q. Where is J.L. going or where did he go?  
2 **A. He is at Palm Beach Atlantic University.**  
3 Q. I was going to say Palm Beach, California, but then  
4 you said Atlantic. Where is that located?  
5 **A. It's in West Palm Beach, Florida.**  
6 Q. Okay. I was just there. It's a nice area.  
7 **A. Yes.**  
8 Q. And, I guess, how close is Excelsior to  
9 Northwestern? Is it relatively close as well?  
10 **A. No, it's quite a difference.**  
11 Q. It is. So was location one of the factors that you  
12 considered in his PSEO or not?  
13 **A. I'm sorry. Could -- I'm not exactly sure what**  
14 **you're asking.**  
15 Q. Yeah. Was the location of Crown something that you  
16 considered in -- or excuse me, of Northwestern,  
17 something that was considered in choosing  
18 Northwestern as a PSEO school for J.L.?  
19 **A. Are you asking as a benefit for him going there?**  
20 **I'm just like --**  
21 Q. Yeah. Was it just a factor that you considered?  
22 **A. Well, I mean, location is a consideration.**  
23 Q. Okay.  
24 **A. Um-uhm.**  
25 Q. How far away is it? How far of a drive?

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1 **A. It's about 45 minutes on a good day.**  
2 Q. No traffic?  
3 **A. Right.**  
4 Q. Is there a reason why G.L. chose to do in-person  
5 classes as opposed to online?  
6 **A. I don't think there's a particular reason, but she**  
7 **wanted to be with, you know, students and be in**  
8 **person in a learning environment in the classroom.**  
9 **That was her preference.**  
10 Q. And you said J.L. did a mix of in-person and online.  
11 Do you know what led to that decision to split it  
12 up?  
13 **A. COVID was part of it.**  
14 Q. So there was a period of time when in person was not  
15 available?  
16 **A. Right.**  
17 Q. Aside from that period of time with COVID, did he  
18 attend in person?  
19 **A. Yes.**  
20 Q. And so for the online courses that he took during  
21 COVID, was he living at home at the time, I would  
22 assume?  
23 **A. Yes.**  
24 Q. Do you know what I mean by the term asynchronous?  
25 **A. No.**

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1 Q. Have you done any online courses?  
2 **A. No.**  
3 Q. So this is a term I wasn't familiar with until my  
4 kids did online COVID learning.  
5 **A. Gotcha.**  
6 Q. Asynchronous is where typically it's not live talk;  
7 it's kind of where you do it at your own pace and  
8 there's videos and materials that you watch and  
9 read.  
10 Synchronous is where there's actually a  
11 professor or teacher teaching the course live while  
12 the students participate in realtime. Do you know  
13 for J.L., was his online experience asynchronous or  
14 synchronous?  
15 **A. I believe it was asynchronous. I guess I'm not**  
16 **positive.**  
17 Q. And did he like that better or worse than being in  
18 person?  
19 **A. He preferred being in person.**  
20 Q. Did he feel like he got a better education in  
21 person?  
22 **A. I don't think it was a better education. I think**  
23 **he just liked the environment of being in person**  
24 **better.**  
25 Q. Being around other people?

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1 **A. Um-uhm.**  
2 Q. Did J.L. ever express any frustration to you about  
3 the online courses at Northwestern?  
4 **A. I don't recall any. No frustrations expressed.**  
5 Q. Did you have any frustrations?  
6 **A. I don't think so, no. Not that I can recall.**  
7 Q. Were there any particular classes that R.L. was  
8 hoping to take in PSEO for a future profession?  
9 **A. Yes. She plans to be a nurse and so she needs lab**  
10 **science classes, which need to be taken in person.**  
11 Q. Is it your understanding that those can't be taken  
12 on online because they're lab courses?  
13 **A. Correct.**  
14 Q. And for J.L., was that a consideration for him as  
15 well, attending in person any courses that he could  
16 only take in the classroom as opposed to online?  
17 **A. I don't recall if that was a consideration for him.**  
18 **He just desired an in-person experience.**  
19 Q. Did R.L. consider any other PSEO schools aside from  
20 Crown College?  
21 **A. No, the University of Northwestern. Well, she's**  
22 **going to the University of Northwestern. R.L. or**  
23 **are you talking about G.L.?**  
24 Q. I'm sorry. I'm talking about G.L. Yeah. Did G.L.  
25 consider any other schools other than Crown College?



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1 **A. Yes, she did.**  
2 Q. What other schools did she consider?  
3 **A. She was accepted at the University of Minnesota for**  
4 **PSEO.**  
5 Q. For in-person courses?  
6 **A. Correct.**  
7 Q. And did she kind of seriously consider going to the  
8 University of Minnesota?  
9 **A. Yeah, she did.**  
10 Q. Do you know why she ultimately decided to go to  
11 Crown instead?  
12 **A. You'd have to ask her to be certain, I think.**  
13 Q. Would you have been okay if she had gone to  
14 Minnesota? Would that have been okay with you?  
15 **A. I want to support, you know, her, what she feels is**  
16 **best for her education.**  
17 Q. So if she had said, I really want to go to the  
18 University of Minnesota, you would have supported  
19 that?  
20 **A. Yes.**  
21 Q. And did J.L. consider any other PSEO schools aside  
22 from Northwestern?  
23 **A. I think the only place he applied was Northwestern.**  
24 Q. Let's talk about R.L. next. Is R.L. currently in  
25 PSEO?

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1 **A. Yes, she is.**  
2 Q. And where is she going?  
3 **A. The same, Northwestern.**  
4 Q. And is it -- I apologize. Is it -e-l R.L. or e-a-l  
5 R.L.?  
6 **A. A-e-l.**  
7 Q. A-e-l. Okay. And is R.L. doing on campus at the  
8 University of Northwestern?  
9 **A. Yes, she is.**  
10 Q. Has she ever done any online there?  
11 **A. She's taking a couple of online classes this**  
12 **semester.**  
13 Q. Through Northwestern?  
14 **A. Correct.**  
15 Q. What has been her experience with the online  
16 courses, if you know?  
17 **A. I don't -- I don't know.**  
18 Q. Do you know if she prefers online versus on campus?  
19 **A. She's only been taking them for a couple three --**  
20 **you know, like a month, so I don't know.**  
21 Q. Just for the new semester?  
22 **A. Yes. Correct.**  
23 Q. Do you know what led her to decide to take some  
24 courses online?  
25 **A. Winter in Minnesota.**

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1 Q. And is she simultaneously still doing some on  
2 campus?  
3 **A. Correct. Um-uhm.**  
4 Q. Is she taking any courses that are kind of geared  
5 toward what she hopes to do some day?  
6 **A. Yes. I think you asked me about her earlier and**  
7 **maybe you were meaning G.L.**  
8 Q. I was. So R.L. wants to be a nurse?  
9 **A. Yes. Correct.**  
10 Q. So she's needing the lab science courses?  
11 **A. Correct.**  
12 Q. And G.L., what about G.L.? Did she have any  
13 specific profession she was considering when she  
14 was thinking about PSEO?  
15 **A. As I recall, she was exploring a lot of different**  
16 **ideas.**  
17 Q. Did R.L. consider any other options for PSEO in  
18 terms of schools?  
19 **A. No, she did not.**  
20 Q. Is that attributable in part to the experience that  
21 J.L. had at Northwestern?  
22 **A. Um-uhm. Yes.**  
23 Q. And do you know, does R.L. have a place that she  
24 hopes to attend for college when she's done with  
25 high school?

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1 **A. Yes. She's hoping to go to the University of**  
2 **Northwestern.**  
3 Q. And complete their nursing program?  
4 **A. Yes.**  
5 Q. Let's talk about O.L. next.  
6 **A. Um-uhm.**  
7 Q. And O.L., I'm guessing, is -- I have a 14 year as  
8 well. She's too young for PSEO; correct?  
9 **A. Yes. Correct.**  
10 Q. Is she a freshman?  
11 **A. She is.**  
12 Q. Has she told you where she hopes to do PSEO some  
13 day?  
14 **A. She's debating. Like Northwestern or Crown are her**  
15 **two choices.**  
16 Q. Are there any other schools that she's considering  
17 that you know of?  
18 **A. Not that I know of.**  
19 Q. And do you know, is she hoping to do in person,  
20 online, or a mix of the two?  
21 **A. I don't know.**  
22 Q. Does she have -- 14 is pretty young to have a  
23 profession in mind, at least it was for me.  
24 **A. Um-uhm.**  
25 Q. Does she have any field of interest at this point?

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1 A. No, she doesn't.  
2 Q. So when G.L. was doing PSEO, did she live at home?  
3 A. She did.  
4 Q. And J.L., did he live at home as well?  
5 A. Yes, he did.  
6 Q. And I presume R.L. does too since R.L. is in high  
7 school?  
8 A. Yes, she is.  
9 Q. Where did G.L. go to high school?  
10 A. To high school?  
11 Q. Yeah.  
12 A. We home schooled.  
13 Q. Did you home school all the children?  
14 A. Yes.  
15 Q. I believe, if you're a home school provider, you  
16 have to essentially come up with graduation  
17 criteria or requirements that your children have to  
18 meet; is that correct?  
19 A. Well, we have to follow the state's requirements  
20 for graduation. Um-uhm.  
21 Q. And so for G.L. and J.L., were they home schooled  
22 from kindergarten?  
23 A. G.L. was home schooled from first grade through 12.  
24 J.L. was home schooled from kindergarten through  
25 12th grade.

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1 Q. And R.L. from kindergarten?  
2 A. Correct. Um-uhm.  
3 Q. Was there -- Where did G.L. do kindergarten at?  
4 A. She did kindergarten at public school in Montclair,  
5 New Jersey.  
6 Q. And did you relocate to Minnesota for first grade?  
7 A. Correct.  
8 Q. And was there a particular reason why you decided  
9 to home school her at that point rather than enroll  
10 her in a public or a private school?  
11 A. Yes.  
12 Q. And why is that?  
13 A. So there are a few different reasons.  
14 Q. Okay. What are they?  
15 A. One is that we wanted to have her to be raised and  
16 learn in a home school environment.  
17 Q. Okay.  
18 A. Because we wanted to be influential in her  
19 education. She was also working much above her age  
20 grade peers, and so we could provide a personalized  
21 education for her that way.  
22 Q. Any other reasons?  
23 A. Those are the two biggest ones.  
24 Q. And were those the same reasons or are those the  
25 same reasons why you decided to home school J.L.

Page 23

1 and R.L.?  
2 A. Yeah. Ultimately we felt that God was calling us to  
3 home school our kids.  
4 Q. And when did you first have that revelation that God  
5 was calling you?  
6 A. When G.L. was in kindergarten.  
7 Q. Okay. And S.L., E.L., and J.L., are they all home  
8 schooling?  
9 A. Yes.  
10 Q. So talking about the graduation requirements. This  
11 is new to me, but how do you go about ensuring that  
12 you're meeting the state's graduation requirements  
13 when you're doing a home school?  
14 A. You know, I -- they're listed, you know, on the  
15 website, and so I just made sure that we've ticked  
16 off all the things that were required.  
17 Q. Provided all the content?  
18 A. Right. Um-uhm.  
19 Q. And is religion, your -- your faith, one of the  
20 aspects of the home schooling that you're providing  
21 your children?  
22 A. Absolutely.  
23 Q. And what is your faith?  
24 A. I'm a Christian.  
25 Q. I know that's a pretty broad term. I grew up

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1 Lutheran. Do you have a particular faith sector or  
2 denomination that you identify with?  
3 A. Well, I have like a world view I identify with as a  
4 Christian. I mean, if you would like me to share  
5 that, I can.  
6 Q. Sure.  
7 A. Okay. I believe in an eternal God, who in the  
8 beginning created the heavens and the earth and  
9 everything in it. The pinnacle of his creation were  
10 Adam and Eve and he made them in His Image. They  
11 walked in close fellowship with God until they  
12 disobeyed him, at which point sin and death entered  
13 the world and a great chasm developed between man  
14 and God. God, in his mercy and love, provided his  
15 son Jesus as a bridge to cross that great divide.  
16 Jesus lived a perfect, sinless life, was crucified  
17 on the cross where he bore the full penalty of our  
18 sins, and was raised from the dead three days later  
19 defeating sin and death.  
20 In that, he offers us the free gift of  
21 salvation because of his sacrifice to all who accept  
22 that gift and belief.  
23 Q. That's very well put.  
24 A. Thank you.  
25 Q. And do you attend a church?

Page 25

1 **A. I do.**  
2 Q. Which church do you attend?  
3 **A. I attend Grace Church.**  
4 Q. And what denomination, if any, is that associated  
5 with?  
6 **A. I believe it's just nondenominational.**  
7 Q. And is that in Excelsior?  
8 **A. No. Ugh-ugh. The main campus is in Eden Prairie.**  
9 **We attend the Chaska campus.**  
10 Q. Okay. What made you choose that particular church  
11 to attend?  
12 **A. It best aligns with our beliefs.**  
13 Q. I know it's a little easier today with the Internet  
14 to see kind of doctrinal beliefs, but is that  
15 something that you would have considered when  
16 choosing a home church?  
17 **A. I'm sorry?**  
18 Q. Doctrinal beliefs or theological positions, are  
19 those things that you considered when choosing a  
20 church?  
21 **A. We believe that our beliefs are in alignment with**  
22 **the theological positions of the church we attend.**  
23 Q. And I should have asked you this earlier when we  
24 were talking about it. I assume you're married to  
25 Mark Loe?

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1 **A. Yes, I am.**  
2 Q. Okay. And what does Mr. Loe do for a living?  
3 **A. He works in finance.**  
4 Q. And how long have you been married?  
5 **A. Twenty-five years.**  
6 Q. And did you meet at Bethel?  
7 **A. No. We're high school sweethearts.**  
8 Q. Oh, great. So he's from Cottonwood as well?  
9 **A. Yes, he is.**  
10 Q. What ultimate -- ultimately made you decide to  
11 relocate from southwestern Minnesota to the  
12 Twin Cities?  
13 **A. Well, we both went to college at Bethel.**  
14 Q. Okay. If any of your children approached you and  
15 asked you to go to PSEO at Bethel, is that something  
16 that you would support?  
17 **A. Perhaps.**  
18 Q. Would you have any reservations about supporting  
19 that?  
20 **A. Yes. I would not be as wholehearted as at**  
21 **Northwestern or Crown.**  
22 Q. And why is that?  
23 **A. We really appreciate the faith statement that**  
24 **Northwestern and Crown provides.**  
25 Q. Were you required, when you did your undergraduate

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1 studies at Bethel, to sign a faith statement?  
2 **A. Yes, we were.**  
3 Q. Do you know anyone who has taken PSEO at Bethel?  
4 **A. I don't think so.**  
5 Q. So you prefer Crown and Northwestern, but if G.L.,  
6 for example, had come to you and said, I really  
7 want to do Bethel for PSEO, would you have  
8 ultimately okayed that?  
9 **A. We would have talked about it.**  
10 Q. Okay. And if you talked about it and she was  
11 passionate, would you have had said okay?  
12 **A. I mean, it's hard to go back now and think about it,**  
13 **but we would have considered it.**  
14 Q. Okay. So what about for O.L., when O.L. gets to  
15 PSEO age and she really -- let's say she really  
16 wants to go to Bethel, is that something that you  
17 would be supportive of?  
18 **A. I think we would have to have a long conversation**  
19 **about it. Um-uhm.**  
20 Q. Can you see a world in which you can agree with  
21 that, with sending her to Bethel?  
22 **A. Perhaps.**  
23 Q. And I know I'm talking about hypotheticals here, so  
24 forgive me. If O.L. came to you and kind of like  
25 G.L. did and said, I'm really considering the

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1 University of Minnesota for PSEO, is that something  
2 that you would support her in?  
3 **A. I think we'd have serious conversations about that**  
4 **as well.**  
5 Q. Okay. And do you think, based on those  
6 conversations, is it possible that you would  
7 support her at the University of Minnesota?  
8 **A. It's possible, but I'm not sure.**  
9 Q. Have you ever been in any other lawsuits?  
10 **A. No.**  
11 Q. Well, I hope that this is not painful for you. I'm  
12 trying to not make it painful for you.  
13 And, again, with the caveat that I  
14 don't want to know anything you and your lawyers  
15 have talked about, and really actually anything  
16 that you and your husband have talked about.  
17 **A. Um-uhm.**  
18 Q. It's probably something that I don't get to know  
19 either.  
20 Who else have you discussed either the  
21 PSEO law change in 2023 or the lawsuit?  
22 **A. You mean, like the law change before it became a**  
23 **law, after it became a law?**  
24 Q. Yeah. So if you think back to when you first  
25 learned that the legislature was proposing to



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1 change the PSEO law, fast forward until today --  
2 **A. Right.**  
3 Q. -- who else have you discussed that with?  
4 **A. Lots of people.**  
5 Q. Okay. Is there a medium through which you've  
6 primarily communicated?  
7 **A. Mostly in person.**  
8 Q. Have you discussed either the law or the lawsuit  
9 with anyone from Crown College in conversations  
10 where your lawyers weren't present?  
11 **A. Yes.**  
12 Q. Who from Crown?  
13 **A. Jen Niska.**  
14 Q. Anyone else from Crown?  
15 **A. I don't believe so.**  
16 Q. What about from Northwestern?  
17 **A. Greg Johnson.**  
18 Q. Anyone else from Northwestern?  
19 **A. I don't think so. Ugh-ugh. There was a professor**  
20 **at Crown too that I talked to about the law change**  
21 **before it happened.**  
22 Q. And who was that?  
23 **A. Her name was Melissa Henderson.**  
24 Q. And what does she teach at Crown?  
25 **A. I actually don't know.**

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1 Q. And what did you discuss with Melissa?  
2 **A. I had talked to her about constitutional law.**  
3 Q. And is she a lawyer?  
4 **A. I think so. That's my understanding.**  
5 Q. Did either Jen or Greg try to persuade you to join  
6 this lawsuit?  
7 **A. No.**  
8 Q. Did you try and persuade anyone to join this  
9 lawsuit?  
10 **A. I did not try to persuade anyone else to join the**  
11 **lawsuit, no.**  
12 Q. Did you invite anyone to join the lawsuit?  
13 **A. Yes.**  
14 Q. Who did you invite?  
15 **A. I asked someone I knew through this process.**  
16 Q. And who was that?  
17 **A. Carrie Feltz (phonetic).**  
18 Q. Have you ever discussed the lawsuit with  
19 Dawn Erickson? And, again, aside from conversations  
20 with your lawyers present?  
21 **A. Ugh-ugh.**  
22 Q. Did you know -- or do you know Dawn Erickson?  
23 **A. No.**  
24 Q. Have you ever met her?  
25 **A. Not outside of the lawsuit.**

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1 Q. I understand that you moderated or were a leader  
2 on a Facebook page?  
3 **A. Correct.**  
4 Q. And that Facebook page, as far as I can tell -- I'm  
5 not on Facebook so I don't know.  
6 **A. Okay.**  
7 Q. -- that kind of predates when the law was passed;  
8 correct?  
9 **A. Correct. Um-uhm.**  
10 Q. What's the name of that Facebook group?  
11 **A. I think it's called Taking Action for PSEO,**  
12 **Minnesota, something like that.**  
13 Q. And were you -- Did you create that group?  
14 **A. Yes, I did.**  
15 Q. Do you recall when?  
16 **A. It would have been the end of February or March of**  
17 **last year.**  
18 Q. And is it a private group on Facebook?  
19 **A. Yes.**  
20 Q. So you have to, at least again, forgive me, I was on  
21 Facebook 15 years ago. That was a while ago. I  
22 think that was before private groups even. Do you  
23 have to ask permission to be admitted?  
24 **A. Yes.**  
25 Q. And are you the person who decides who gets to be

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1 admitted?  
2 **A. Yes.**  
3 Q. And did you communicate about the PSEO law change  
4 on that Facebook page?  
5 **A. Yes.**  
6 Q. Did you communicate about the lawsuit on that  
7 Facebook page?  
8 **A. Just we announced that there was a lawsuit.**  
9 Q. Have you -- So we served what are called discovery  
10 requests --  
11 **A. Um-uhm.**  
12 Q. -- in this case. Have you taken a look at that  
13 Taking Action for PSEO Facebook page to see if  
14 there's any material on there that might be  
15 responsive to the requests that we made?  
16 **A. I have no idea.**  
17 Q. Is the site still active, the page?  
18 **A. It's still there, yes. It's not really active.**  
19 Q. And do you recall, again, an estimate here, how  
20 many people were ultimately admitted?  
21 **A. More than 500.**  
22 Q. And were any people denied admission?  
23 **A. I don't recall.**  
24 Q. Were there any dissenting viewpoints that were  
25 provided in that forum? And by that I mean anybody

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1 who said, hey, I hear your concerns but I think  
2 that this law is okay?  
3 **A. I don't remember specifically, no.**  
4 Q. Have you discussed the lawsuit with any state  
5 legislatures? Now, I want to carve -- make a  
6 carveout here. I understand that you provided  
7 legislative testimony; correct?  
8 **A. Right. Um-uhm.**  
9 Q. With the exception of that testimony, which is  
10 publicly available --  
11 **A. Right.**  
12 Q. -- did you have any discussions with state  
13 legislators about the PSEO law change?  
14 **A. I did not have any personal conversations with any**  
15 **legislators. Like -- Well, I mean, I talked to**  
16 **them after, when I did the testimony. Is that what**  
17 **you're talking about?**  
18 Q. Yeah. Did you have any face-to-face meetings with  
19 any state legislators?  
20 **A. We chatted like after the committee meeting.**  
21 Q. After the committee meeting that you testified at  
22 or --  
23 **A. Um-uhm. Yes.**  
24 Q. Did you chat after other committee meetings as well?  
25 **A. No.**

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1 Q. Do you remember who you chatted with after the  
2 committee meeting that you testified at?  
3 **A. Oh, good question. I know I talked to Ben Vakeberg**  
4 **(phonetic), I think, and Bennett Knutson. And then**  
5 **I know I -- I know I talked to my representative,**  
6 **but I can't remember her name right now. Why can't**  
7 **I remember her name? I don't remember.**  
8 Q. Do you know if your representative voted in favor  
9 of the PSEO law?  
10 **A. She didn't. She -- she wanted the law changed. We**  
11 **have opposing viewpoints on this.**  
12 Q. Okay. And did -- at any point in time did you  
13 communicate with any legislators by e-mail or text  
14 message about the law change and the lawsuit?  
15 **A. I mean, I sent my concerns to legislators, you know,**  
16 **like --**  
17 Q. Did you ever have any conversations with -- with  
18 your representative about her opposing viewpoint?  
19 **A. Well, that was my frustration. She wouldn't respond**  
20 **to me via e-mail, and so when we talked in person,**  
21 **I expressed my concerns.**  
22 Q. And when did you talk in person?  
23 **A. After one of the committee meetings.**  
24 Q. And what did she say, if you recall?  
25 **A. Something like, she's just very busy or something.**

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1 **She was very dismissive.**  
2 Q. Did she mention to you her viewpoints on the law?  
3 **A. No, she didn't seem very interested to me, which**  
4 **was disappointing.**  
5 Q. Did you talk with any other -- or communicate in  
6 any way with any other legislators who disagreed  
7 with your viewpoint?  
8 **A. Yeah. I sent -- I sent e-mails to a lot of**  
9 **legislators.**  
10 Q. Did you get responses from any of them?  
11 **A. There were a lot of like canned replies.**  
12 Q. Did any of them who you communicated with explain  
13 to you why they were -- why their viewpoint was  
14 different than yours?  
15 **A. Yes. Like there's a lot of canned responses. They**  
16 **weren't engaging me specifically.**  
17 Q. And do you recall what those canned responses said?  
18 **A. It would have been like some of the talking points;**  
19 **you know, that this is -- we're trying to, I think,**  
20 **open access for students.**  
21 Q. Okay. And do you have an understanding of what  
22 they meant by that?  
23 **A. I think they do, but I disagree.**  
24 Q. Okay. And what do you think they meant by open  
25 access?

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1 **MR. FLESHMAN:** Objection; calls for  
2 speculation.  
3 Q. If you know.  
4 **MR. FLESHMAN:** You can answer.  
5 **A. I'm sorry. What was the question?**  
6 Q. Yeah. Did any of them explain to you what they  
7 meant by open access?  
8 **A. Not specifically, no. I have an idea of what they**  
9 **were trying to get at.**  
10 Q. And what is your idea?  
11 **A. I think they want to force the schools to remove**  
12 **the faith requirements, and the schools, in not**  
13 **doing so, it will actually reduce the choices for**  
14 **students, so I disagree with that.**  
15 Q. Because you think it will reduce the number of  
16 choices?  
17 **A. Yes. There will be fewer PSEO slots available for**  
18 **students if Crown and Northwestern remove their**  
19 **PSEO programs from on-campus learning.**  
20 Q. Unless another institution increases its capacity;  
21 correct? In the same amount potentially?  
22 **A. But it wouldn't be the same environments.**  
23 Q. And when you communicated with Jen Niska and  
24 Melissa Henderson and legislators and Greg Johnson  
25 as well about the lawsuit, did you do that by

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1 cellphone, e-mail, when you were doing written  
2 communication?  
3 **A. That would have been, yeah, by cellphone.**  
4 Q. Okay. And any e-mails that you can recall sending?  
5 **A. Who are you asking about again?**  
6 Q. Craig Johnson, Jen Niska, Melissa Henderson, or any  
7 legislator.  
8 **A. Again, I e-mailed legislators, but I did not e-mail**  
9 **the others.**  
10 Q. Have you taken a look to see if you have any of  
11 those e-mails and given them to your lawyers?  
12 **A. I haven't looked.**  
13 Q. Have you looked for any documents at all that might  
14 be responsive to the lawsuit?  
15 **A. No.**  
16 Q. Are you aware that the Department of Education  
17 requested some documents from you?  
18 **MR. FLESHMAN:** Objection; calls for a  
19 legal conclusion, I guess.  
20 **A. No.**  
21 Q. All right. So your church and your faith, is there  
22 a particular version of the Bible that is considered  
23 to be the guiding text?  
24 **A. No.**  
25 Q. And in your faith do you believe that the Bible is

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1 inerrant? And by that I mean perfect, there are no  
2 mistakes.  
3 **A. I believe that the Bible is the inspired word of**  
4 **God. All scripture is God breathed and Psalm 12**  
5 **and 19 says it is perfect and flawless.**  
6 Q. So do you believe you should follow everything the  
7 Bible says?  
8 **A. I believe that -- Well, what do you mean exactly**  
9 **by that, everything the Bible says?**  
10 Q. Yeah. The Bible gives a command, do you believe  
11 that you should follow that in your life?  
12 **A. It depends on what command you're talking about.**  
13 Q. Any command. I'm just asking generally. If a  
14 Bible gives a command or a rule, is that something  
15 that you believe you should follow in your life?  
16 **A. Well, there are different commands and rules that**  
17 **the Bible gives. Some were given to the Israelites**  
18 **in the time of theocracy that do not necessarily**  
19 **apply to the New Testament church today.**  
20 Q. So you believe that the commands and rules given to  
21 the Israelites at the time of theocracy or  
22 anachronistic are no longer applicable?  
23 **A. There are some that are no longer applicable.**  
24 Q. How do you know which ones are not?  
25 **A. Well, Jesus came to fulfill the law and he affirmed**

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1 **parts of the law that we still hold to.**  
2 Q. So if Jesus essentially reinforced what -- what the  
3 old command or rule and the old theocracy was, you  
4 believe that that was a command that you should  
5 follow in your life?  
6 **A. Correct.**  
7 Q. What about commands or rules that, you know, Jesus  
8 didn't -- that the Bible doesn't mention Jesus  
9 taking a position on, is it your belief that those  
10 are still valid or that really the focus is on only  
11 those that Jesus has adopted?  
12 **A. We live in the New Testament church now and the time**  
13 **after Jesus.**  
14 Q. So only those that Jesus has adopted?  
15 **A. Well, you'd have to be more specific.**  
16 Q. Yeah. So, for example --  
17 **A. I mean, the Bible is full of commands and -- and**  
18 **rules and you could pull out really picky ones from**  
19 **the Old Testament and then, you know, hold me to**  
20 **that and ask me and I can respond to those, but as**  
21 **a general rule, Jesus fulfilled the law.**  
22 Q. Okay.  
23 **A. And we follow what he says now.**  
24 Q. So do you -- One of those old picky ones is, and I  
25 don't think Jesus had anything to say about this,

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1 is that people should not wear more than one kind  
2 of fabric.  
3 **A. Right.**  
4 Q. I'm sure you've heard that one. Since Jesus didn't  
5 have anything to say about that, do you believe that  
6 that is kind of a relic?  
7 **A. That was a law that was given to the Israelites for**  
8 **a specific time and a specific purpose.**  
9 Q. So that essentially is no longer effective?  
10 **A. Right.**  
11 Q. What about same sex relationships or same sex  
12 attraction, was that a law that was given to the  
13 Israelites as well?  
14 **A. That's, I'm sure, a complicated issue.**  
15 Q. Yeah. I'm just asking you from your belief  
16 perspective. So do you know whether -- what book  
17 of the Bible talks about having a relationship with  
18 someone of your own sex?  
19 **A. I'm not sure of the specific book, but I know that**  
20 **that was -- that was a command given in the Old**  
21 **Testament times.**  
22 Q. And that was given to the Israelites; correct?  
23 **A. Correct. Um-uhm.**  
24 Q. And did Jesus have anything to say about that?  
25 **A. Yes.**

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1 Q. What did Jesus say?  
2 A. When he was asked about marriage and divorce, he  
3 went out of his way to describe marriage as being  
4 between man and woman.  
5 Q. And what did he say about divorce?  
6 A. I'm sorry?  
7 Q. What did Jesus say about divorce?  
8 A. I'm trying to remember exactly. Well, I mean,  
9 that's not God's plan for marriage.  
10 Q. So you mentioned marriage, Jesus talking about how  
11 marriage is between a man and a woman.  
12 A. Um-uhm.  
13 Q. Do you know if Jesus said anything about  
14 relationships that weren't marriage between people  
15 of the same sex? So dating, for example.  
16 A. I don't believe he talked about dating in the  
17 Bible. It wasn't exactly a thing then.  
18 Q. You don't think same sex relationships were a thing  
19 then?  
20 A. You said dating.  
21 Q. Or dating. Okay.  
22 A. Yeah. I said I don't think dating was a thing then.  
23 That's what you're talking about; correct?  
24 Q. Yeah.  
25 A. You said dating in the Bible.

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1 Q. I don't think there were long courtships in that  
2 time. I think you're right.  
3 You understand that there are different  
4 Christian faith traditions that all believe in  
5 Jesus; correct?  
6 A. Yes.  
7 Q. So Catholicism would be one; correct?  
8 A. Um-uhm.  
9 Q. And Lutheranism would be another?  
10 A. (No response.)  
11 Q. Correct.  
12 A. I'm sorry. Yes. I was just nodding. Yes.  
13 Q. And Protestantism is another; correct?  
14 A. Sure.  
15 Q. Is your home church Catholic? You said it's  
16 nondenominational; correct?  
17 A. No, it is not.  
18 Q. Did you grow up Catholic?  
19 A. No.  
20 Q. Did you grow up in church?  
21 A. I did.  
22 Q. What kind of church background do you have?  
23 A. Evangelical free.  
24 Q. Do you have any concerns about your children  
25 attending PSEO courses with students who aren't

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1 Christian?  
2 A. What do you mean?  
3 Q. Yeah. So a kid who identifies either as an atheist  
4 or agnostic or a different faith tradition?  
5 A. I don't have a problem with that, but we would  
6 prefer that they were in an environment that is  
7 Christ centered.  
8 Q. So you would be okay if they attended with kids who  
9 aren't Christian but you'd prefer a Christian  
10 environment?  
11 A. Right.  
12 Q. Do you have any problem or concerns with your  
13 children attending PSEO courses with students who  
14 are gay?  
15 A. No.  
16 Q. Do your children have gay friends?  
17 A. I'm not sure.  
18 Q. Do you?  
19 A. Not close.  
20 Q. Acquaintances?  
21 A. Yeah. Acquaintances, sure.  
22 Q. Do you have any problems or concerns about your  
23 children attending PSEO classes with students who  
24 are transgender or nonbinary?  
25 A. No, but we prefer that they were in like a

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1 Northwestern and Crown College environment.  
2 Q. Where those kids are not attending?  
3 A. No, they do -- they can attend there.  
4 Q. They can attend there?  
5 A. Well, I'm sorry. Can you ask the question again?  
6 Q. Yeah.  
7 MR. TIMMERMAN: Could you read it back?  
8 (Last question read back)  
9 A. No.  
10 Q. Do you know if your children have any friends who  
11 are transgender or nonbinary?  
12 A. I'm not sure about that.  
13 Q. Do you?  
14 A. I don't think so.  
15 Q. Do you believe that gay students can attend PSEO on  
16 campus at Crown and Northwestern?  
17 A. I believe if they sign the faith statement they can.  
18 Q. Do you know what that faith statement says about  
19 them?  
20 A. No.  
21 Q. Have you ever reviewed the faith statements from  
22 the schools?  
23 A. I'm sure I have, but it's been a long time.  
24 Q. Do you think that transgender and nonbinary students  
25 can attend on-campus PSEO at Crown and Northwestern?



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1 A. I'm not sure.  
2 Q. We've been going about an hour. Would you like to  
3 take a break?  
4 A. That would be great.  
5 (Recess taken from 1:59 p.m. to  
6 2:13 p.m.)  
7 BY MR. TIMMERMAN:  
8 Q. Okay. Well, I'm going to pick up on a little bit  
9 of a different line here. So if this law is upheld,  
10 would R.L. continue to do PSEO?  
11 A. I'm not sure.  
12 Q. What would your options be at that point?  
13 A. Well, it depends on what the schools decide to do  
14 if the law is upheld.  
15 Q. So if the law is upheld and the schools decide to  
16 keep providing on-campus PSEO, would R.L. continue  
17 to do on-campus PSEO at Northwestern?  
18 A. If they continue to offer PSEO. So you're saying  
19 if they drop the faith statement?  
20 Q. Yeah.  
21 A. I mean, I'm not sure. We would be very disappointed  
22 if they made that choice.  
23 Q. Okay. Would you at least consider still sending  
24 R.L. to Northwestern for PSEO?  
25 A. I think it would maybe be a consideration.

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1 Q. Would you consider online PSEO as an option for  
2 R.L.?  
3 A. I'm not sure that's an option for her.  
4 Q. Why is that?  
5 A. Because she will need the lab science classes.  
6 Q. That's right. What about for O.L., if the schools  
7 drop their faith statements, would she still  
8 consider going to Northwestern?  
9 A. Or Crown.  
10 Q. Crown, excuse me.  
11 A. Crown or Northwestern.  
12 Q. Right.  
13 A. I'm not sure which one she would go to. I don't  
14 know. She doesn't have a firm, you know, thought  
15 of what she wants to do after high school, so we  
16 just have to have conversations about it.  
17 Q. If she was interested in a certain profession that  
18 like A University that provides PSEO specializes in,  
19 would you consider sending O.L. to that PSEO  
20 institution?  
21 A. We would just have to have lots of conversations  
22 about it.  
23 Q. Yeah. I'm just thinking about the University of  
24 Minnesota since it's so big and it has so many  
25 different specialties.

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1 A. Right, but, you know, the primary goal for our  
2 family as home educators, first we want them to be  
3 Godly and then we want them to be smart.  
4 Q. Is there concern that if the faith statements are  
5 dropped, that that will impact the smart aspect of  
6 your goal?  
7 A. No. It just changes -- it might change their  
8 experience.  
9 Q. How would it change their experience?  
10 A. Well, it just depends on what they decide to do. My  
11 understanding is that Northwestern and Crown will  
12 not continue to offer PSEO if they are forced to  
13 drop the faith statement, so then it would not be a  
14 possibility for them.  
15 Q. Is it your position that your children can only  
16 receive a Godly PSEO education at an institution  
17 that requires a faith statement?  
18 A. Here's the thing. Like many -- I'm just trying  
19 to decide how to explain this the way that you will  
20 understand.  
21 We believe that any and all sin  
22 separates us from God; and so we all, as humans,  
23 have a shared identity as a sinner. I'm a sinner,  
24 you're a sinner, everyone in this room is a sinner.  
25 I can say, though, that I'm a sinner redeemed by

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1 the blood of Jesus, and because of that, that  
2 informs how I live my life, how I make my choices,  
3 and that what I do and how I live is one that is  
4 seeking after a life in accordance with how Christ  
5 lived - to be sanctified and becoming more Christ  
6 like. And that certainly informative years are  
7 easier if you're surrounded by people seeking that  
8 same thing.  
9 Q. So you prefer that your children do PSEO at an  
10 institution that's also focused on pursuing a  
11 Christ-like life?  
12 A. A Christ-centered environment, um-uhm. Right.  
13 Q. And do you believe that both Northwestern and Crown  
14 provide a Christ-centered environment for PSEO  
15 students?  
16 A. Yes, they do.  
17 Q. And what is that based on?  
18 A. Well, as I understand it, they share that same  
19 particular understanding of the Christian faith that  
20 Representative Pryor discussed on the floor and  
21 said that they were targeting these two institutions  
22 because they shared the same faith as we do.  
23 Q. Is the fact that Crown and Northwestern provide  
24 Christ-centered PSEO education the biggest factor  
25 in your decision?



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1 A. I think so, yes.  
2 Q. Are you concerned that your children will be  
3 negatively influenced if they attend PSEO with  
4 students that aren't focused on a Christ-centered  
5 life?  
6 A. What do you mean by negatively influenced?  
7 Q. That they will be exposed to harmful influences.  
8 A. I'm not concerned that they will be exposed in that  
9 way. They are strong-minded individuals. They  
10 think for themselves.  
11 Q. Do you believe it's ever okay to discriminate?  
12 MR. FLESHMAN: Objection; calls for a  
13 legal conclusion. You can answer if you know.  
14 A. I'm not sure what you mean by discriminate.  
15 Q. Do you have a general understanding of what  
16 discriminate means?  
17 MR. FLESHMAN: Same objection. You  
18 can answer if you know.  
19 Q. According to your understanding.  
20 A. Well, according to my understanding, this law is  
21 doing exactly that and discriminating against my  
22 children and not allowing them to take their  
23 dollars that belong to them and use them at a  
24 faith-based institution of their choosing.  
25 Q. I understand that's your position. I'm asking

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1 you your understanding of what -- Since you said  
2 that, I think you understand what discrimination  
3 means; correct?  
4 A. Well, I mean, I have an idea of what it means. I  
5 don't know if it's the same way as you're  
6 describing.  
7 Q. Sure. So what do you think it means?  
8 A. To like force people to not -- to shut people out  
9 or to exclude. Is that what you would be saying  
10 discriminate is?  
11 Q. Yeah. Based on some factor; right?  
12 A. Right.  
13 Q. Some characteristic.  
14 A. In this case you are trying to exclude my students  
15 from participating in a faith-based institution of  
16 their choosing.  
17 Q. Do you believe it's ever okay to discriminate based  
18 on religion?  
19 MR. FLESHMAN: Objection; calls for a  
20 legal conclusion. You can answer.  
21 A. Well, I think it depends.  
22 Q. What does it depend on?  
23 A. The situation.  
24 Q. How so?  
25 A. Well, I don't know what you're asking exactly. Like

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1 what situation are you talking about?  
2 Q. Just ever. I'm saying, do you believe it's ever  
3 okay to discriminate based on religion?  
4 MR. FLESHMAN: Same objection. You  
5 can answer if you know.  
6 A. I don't think I know exactly -- I feel like you're  
7 trying to get at something and I'm not sure what  
8 you're trying to get at, and so I'm not sure how to  
9 answer in a way that is, you know, consistent with  
10 what I think about things. You know, I think we're  
11 just looking at things in different ways.  
12 Q. Let's come back to that question. Do you think it  
13 is ever okay to discriminate based on race?  
14 MR. FLESHMAN: Same objection. You can  
15 answer.  
16 A. No.  
17 Q. Do you think it's ever okay to discriminate based  
18 on gender?  
19 MR. FLESHMAN: Same objection.  
20 A. I don't know. I don't think so, but --  
21 Q. What about disability status, do you think it's  
22 okay to discriminate against someone based on their  
23 disability?  
24 MR. FLESHMAN: Same objection.  
25 A. I think it depends on what you're talking about.

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1 Q. Just in life in general.  
2 A. Well, but it depends on what you're talking about.  
3 Q. Sure. Do you think it's fair as a personal value  
4 that you hold to treat someone differently in a  
5 negative manner because they're disabled?  
6 A. In general, no, but I think there are circumstances  
7 where one could say you'd be discriminating against  
8 someone who, say, is blind and say they cannot be a  
9 firefighter. You know, is that discrimination  
10 because they can't race into a burning building that  
11 they're unfamiliar with to save someone? Is that --  
12 are you -- Do you understand what I'm saying?  
13 Q. Sure.  
14 A. There are instances where you select people to do a  
15 certain task or do a certain job based on certain  
16 qualities; correct?  
17 Q. Sure.  
18 A. And if you're excluding them based on the qualities  
19 or qualifications or just based on your criteria, I  
20 mean, that's a selection. I don't know it's  
21 discrimination. So I think that's where I'm not  
22 sure where we're headed here.  
23 Q. Do you think it's okay for a school to discriminate  
24 in admissions based on skin color?  
25 MR. FLESHMAN: Objection; calls for a

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1 legal conclusion. You can answer.  
2 **A. I don't think so.**  
3 Q. Do you think it's okay for a school to discriminate  
4 in admissions based on sexual orientation?  
5 **MR. FLESHMAN:** Same objection.  
6 **A. I think all schools have selection criteria that**  
7 **they use to admit students. The University of**  
8 **Minnesota, as I recall last year on their website,**  
9 **said they had 1,600 applicants for PSEO but they**  
10 **only admitted 45 percent. I don't know what**  
11 **selection criteria they used to admit or not admit**  
12 **students.**  
13 Q. Okay. But my question was just a little bit  
14 different.  
15 **MR. TIMMERMAN:** Could you read it back,  
16 please?  
17 (Last question read back)  
18 **A. Are you asking if -- if I think Northwestern and**  
19 **Crown discriminates based on sexual orientation?**  
20 Q. I'm asking you for your belief.  
21 **A. I'm not sure how to answer that.**  
22 Q. Is there some part of it that you don't understand?  
23 **A. Well, I just think we're -- you know, again we're**  
24 **talking about different things, and so I'm having a**  
25 **hard time understanding what you're getting at, I**

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1 **guess.**  
2 Q. I think it was a pretty simple question. I'm  
3 asking you your belief. Do you think it's okay for  
4 a school to discriminate based on sexual orientation  
5 in the admission process?  
6 **MR. FLESHMAN:** Objection to the extent  
7 it calls for a legal conclusion. You can answer if  
8 you know.  
9 **A. Well, I don't -- I don't think I know exactly. I**  
10 **mean --**  
11 Q. You don't have a belief one way or the other on  
12 that?  
13 **A. Well, I just --**  
14 **MR. FLESHMAN:** Melinda, you don't  
15 have to answer yes or no. If you want to explain  
16 what you think about it, you can explain.  
17 **THE WITNESS:** Okay. Thank you.  
18 **A. I just don't think that is anything that colleges**  
19 **do. I don't think they're doing that. I don't**  
20 **think they're excluding people based on their**  
21 **sexual orientation, so I don't think it matters**  
22 **what I think about it. I don't think that's what**  
23 **they're doing.**  
24 Q. That's fine, but I've asked you what you think  
25 about it, so I've asked you a different question.

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1 I've asked you what you think about it.  
2 **A. I don't think it's something that is done.**  
3 Q. Okay. Do you believe it's okay to do that, though?  
4 **A. I think schools have a right to select students.**  
5 Q. And by that you mean select whatever characteristics  
6 they prefer?  
7 **MR. FLESHMAN:** Objection to the extent  
8 it mischaracterizes her testimony. You can answer.  
9 **A. I'm just trying to think. Again, I just don't**  
10 **think that is what's happening and I don't think**  
11 **that is what they do so.**  
12 Q. Okay. But that was not my question.  
13 **A. Right. I'm sorry. What is your question again?**  
14 Q. The question is, do you think it's okay, do you  
15 believe, in your belief, it's okay for a school to  
16 discriminate on the basis of sexual orientation in  
17 the admissions process?  
18 **A. I'm not sure.**  
19 Q. Okay. Do you believe it's okay for a school to  
20 discriminate on the basis of gender identity --  
21 **MR. FLESHMAN:** Objection.  
22 Q. -- in the admissions process?  
23 **MR. FLESHMAN:** Objection to the extent  
24 it calls for a legal conclusion. You can answer if  
25 you know or if you have an opinion.

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1 **A. I guess I'm just not sure.**  
2 Q. You don't have a belief one way or the other?  
3 **A. I don't have a belief about this particular issue**  
4 **as it relates to discrimination in admission to**  
5 **schools.**  
6 Q. Okay. Have you ever paid anything out-of-pocket for  
7 your children to attend PSEO?  
8 **A. We have not.**  
9 Q. What is your understanding about how PSEO is funded?  
10 **A. Well, I don't understand a lot about the details.**  
11 Q. What is your understanding of who paid for your  
12 children's PSEO?  
13 **A. I believe the money comes from the state via tax**  
14 **dollars to our child, who then takes it to the**  
15 **school of their choosing. Schools are approved by**  
16 **the Minnesota Department of Education to offer PSEO.**  
17 Q. So you said that you believe the money comes to the  
18 student to take with them. You didn't get a check  
19 from the state, did you?  
20 **A. No.**  
21 Q. The money was just sent to the institutions that  
22 your children ended up attending?  
23 **A. Yes.**  
24 Q. Has your family ever borne any out-of-pocket  
25 expenses for PSEO textbooks or materials?

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1 A. No.  
2 Q. Are you familiar with the PSEO courses that R.L. is  
3 currently taking at Northwestern?  
4 A. Generally, yes.  
5 Q. Which courses?  
6 A. Currently she's taking an anatomy class and she's  
7 taking a math class, a writing class, and I believe  
8 a history class.  
9 Q. Have you ever seen a syllabi for any of those  
10 classes?  
11 A. No, not for those.  
12 Q. Have you ever seen any textbooks or course materials  
13 for any of those classes?  
14 A. Probably in passing in my house.  
15 Q. Have you seen a syllabi for any PSEO courses at  
16 Crown and Northwestern?  
17 A. I can remember looking at my son's for one of his  
18 classes. I don't remember which one.  
19 Q. One of J.L.'s classes?  
20 A. Um-uhm. Yes.  
21 Q. Do you know whether R.L., J.L., or G.L. had prayed  
22 in PSEO classes?  
23 A. I don't know.  
24 Q. I'd have to ask them that?  
25 A. Right.

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1 Q. Do you know whether any of the three of them have  
2 read the Bible or Bible verses in any of their PSEO  
3 classes?  
4 A. I don't know.  
5 Q. Would you expect that is something that should be  
6 part of their PSEO education?  
7 A. I don't know.  
8 Q. Have R.L. or G.L. or J.L. ever expressed to you any  
9 discomfort with any of their peers in any PSEO  
10 classes?  
11 A. No.  
12 Q. What about with any of their professors?  
13 A. Not that I can recall.  
14 Q. Have you met any of the professors?  
15 A. I don't think so, no.  
16 Q. I assume that R.L. has access to her current course  
17 syllabi; correct?  
18 A. Yes.  
19 Q. Do you know if J.L. and G.L. have access to their  
20 old course syllabi?  
21 A. I don't know. I would doubt it, but I don't know.  
22 Q. How did you come to learn -- So let's think back  
23 to the time when you were looking at PSEO with G.L.  
24 And I apologize. She went to Crown; correct?  
25 A. Correct.

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1 Q. How did you come to understand that Crown was  
2 offering PSEO?  
3 A. Well, initially she applied to go to Northwestern  
4 because she lived up just the road from  
5 Northwestern. When we moved to Excelsior, we were  
6 closer to Crown, so that became more of an option  
7 for her.  
8 Q. And do you know how you learned that Crown offered  
9 PSEO or Northwestern?  
10 A. Probably an Internet search. I don't recall.  
11 Q. As someone who home schools your kids, you seem  
12 really invested in your children's education, so I  
13 would assume that you would have researched Crown  
14 or Northwestern to some extent before you decided to  
15 enroll your children?  
16 A. Sure.  
17 Q. What did you do to check out Crown or Northwestern  
18 for your children?  
19 A. We talked to other people who had kids who went  
20 there.  
21 Q. And what did they say?  
22 A. They spoke very highly of their experiences there.  
23 Q. Did they mention any particular aspects of their  
24 experiences that were positive?  
25 A. Not anything specific, I guess.

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1 Q. Is it fair to say that you want -- you've wanted  
2 your students to do PSEO at Crown and Northwestern  
3 because you wanted them to have a Christian  
4 education?  
5 A. Um-uhm.  
6 Q. That's a yes?  
7 A. We want them to be in a Christ-centered environment.  
8 Q. And receive a Christian education; correct?  
9 A. Yes.  
10 Q. So how involved were you with the actual -- Let's  
11 go back. Let's think about G.L. here.  
12 A. Yeah.  
13 Q. We're jogging everyone's memory, but do you recall  
14 when G.L. applied for PSEO at Crown, do you recall  
15 what kind of a process she had to go through at  
16 Crown?  
17 A. Oh, my goodness. It does seem like a long time ago.  
18 There was an application process. I  
19 know I had to pull together a transcript. And I  
20 don't remember much beyond that. Sorry.  
21 Q. Do you know, did G.L. need a spiritual reference at  
22 all?  
23 A. I don't recall.  
24 Q. Do you know if G.L. had to answer any questions  
25 about her faith?

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1 **A. I don't recall.**  
2 Q. Have you ever seen Crown's statement of faith?  
3 **A. I'm sure I have.**  
4 Q. Have you ever seen Crown's community covenant?  
5 **A. Probably so.**  
6 Q. Do you recall what those documents say?  
7 **A. Not specifically.**  
8 Q. Do you know if G.L. had to give an interview to be  
9 admitted at Crown PSEO?  
10 **A. I don't remember.**  
11 Q. Did G.L. ever get any discipline during her time at  
12 PSEO at Crown?  
13 **A. Discipline?**  
14 Q. Yeah.  
15 **A. I don't think so. I can't imagine.**  
16 Q. What about for J.L. and R.L., how involved were you  
17 with the application process at Northwestern?  
18 **A. You know, I encouraged them in the process, you**  
19 **know. They're of the age where I'm coaching them.**  
20 **I'm not doing things for them anymore.**  
21 Q. Have you ever seen the application process from  
22 Northwestern, what it looks like?  
23 **A. Again, I believe there's an application and, you**  
24 **know, I had to provide a transcript, and I believe**  
25 **there was a submitted video of some sort.**

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1 Q. A video essay?  
2 **A. I think so. Something like that. I don't know.**  
3 Q. Did you help with that?  
4 **A. I don't think so. They're pretty on-their-own kids.**  
5 Q. Did you ever see their videos?  
6 **A. No. I think it was like a -- you submit and it's**  
7 **gone kind of a thing.**  
8 Q. Like --  
9 **A. Like you do it -- it's like live -- It's not live,**  
10 **but I think it's not like we recorded it and then**  
11 **sent it. It was something that they just did and**  
12 **it was done and I wasn't there for it.**  
13 Q. Oh, okay. Do you know if either G.L. -- or excuse  
14 me, J.L. or R.L. ever had to provide a spiritual  
15 reference as part of their application process?  
16 **A. I don't remember. I don't recall.**  
17 Q. Do you know if either of them had to sign a faith  
18 statement?  
19 **A. For who are you talking about?**  
20 Q. J.L. and R.L.  
21 **A. I assume so.**  
22 Q. Do you know what that faith statement says?  
23 **A. No.**  
24 Q. Did you ever review it?  
25 **A. I probably did, but I don't recall the details.**

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1 Q. Do you know whether J.L. and R.L. had to agree to  
2 abide by any type of a covenant or conduct document  
3 at Northwestern?  
4 **A. I'm not sure.**  
5 Q. Have you seen any kind of a declaration or a  
6 covenant or conduct document from Crown or  
7 Northwestern?  
8 **A. I don't know.**  
9 Q. Do you think it's fair for a kid, a high school kid,  
10 to have to state that they believe that in Jesus  
11 Christ even if they don't in order to take on-campus  
12 classes at Crown and Northwestern?  
13 **A. What do you mean by fair?**  
14 Q. Yeah. Do you think it's fair? Your internal sense  
15 of fairness?  
16 **A. So like right?**  
17 Q. Right. So if I'm a Muslim kid --  
18 **A. Right.**  
19 Q. -- and I live a block from Northwestern and I want  
20 to do on-campus PSEO, is it fair for me to have to  
21 say that I believe in Jesus Christ to do on-campus  
22 PSEO at Northwestern?  
23 **A. Well, if the Islamic University of Minnesota offered**  
24 **PSEO classes, would it be fair for Christian**  
25 **students to have to sign a faith statement to go to**

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1 **that school or wear a hijab to go to that school?**  
2 Q. That's not what my question is.  
3 **A. Right, but it is --**  
4 Q. Could you answer my question?  
5 **A. Well, it would be fair, right, if the schools have a**  
6 **right to select students.**  
7 Q. Would you agree with me that in that instance the  
8 students are having to essentially proclaim  
9 something that's contrary to their personal faith?  
10 **MR. FLESHMAN: Objection.**  
11 **A. They don't have to sign it.**  
12 **MR. FLESHMAN: Objection to the extent**  
13 **it mischaracterizes your testimony but you can**  
14 **answer and clarify.**  
15 **A. No one is forcing them to sign it.**  
16 Q. Do you know if they can attend on campus if they  
17 don't sign it?  
18 **A. I don't know.**  
19 Q. Would it surprise you to learn that they can't?  
20 **A. No.**  
21 Q. Do you think that's fair?  
22 **A. Sure.**  
23 Q. Do you think that discriminates against that student  
24 on the basis of religion?  
25 **MR. FLESHMAN: Objection to the extent**



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1 it calls for a legal conclusion. You can answer.  
2 **A. No. They have lots of other choices where they**  
3 **could go to be in an environment surrounded by**  
4 **people who think like them.**  
5 Q. Well, you're assuming a lot of things when you say  
6 that, though; right? You're assuming that they  
7 have the means to get to a different environment,  
8 you're assuming that they have family support to  
9 help transport them someplace; right? That's loaded  
10 with assumptions, would you agree?  
11 **A. No, because the same could be said for any Christian**  
12 **student, a student like mine who would desire to**  
13 **attend Crown or Northwestern in a Christ-centered**  
14 **community and then would be forced not to do so**  
15 **because the schools have been forced by the state**  
16 **to close their programs.**  
17 Q. So you think that your children's right to attend a  
18 school that has a Christ-centered environment is  
19 more important than the rights of an Islamic kid to  
20 attend on campus at Northwestern?  
21 **MR. FLESHMAN:** Objection.  
22 Q. Is that fair to say?  
23 **MR. FLESHMAN:** To the extent it  
24 mischaracterizes your testimony and calls for a  
25 legal conclusion.

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1 **A. I did not say that.**  
2 Q. Is that fair to say?  
3 **A. That's not what I said.**  
4 Q. But I'm asking you, is that a fair statement?  
5 **A. Can you repeat what you were saying I'm saying?**  
6 Q. Yeah. That your children's right to attend  
7 on-campus PSEO at Northwestern in a Christ-like  
8 environment or a Christ-centered environment is  
9 more important than the rights of an Islamic student  
10 who lives next to Northwestern to attend Crown --  
11 or excuse me, to attend Northwestern on campus?  
12 **A. I don't think my children have rights that are more**  
13 **important than any other child.**  
14 Q. You don't?  
15 **A. No. I don't think they have rights that are more**  
16 **important than anyone else. That's not what I**  
17 **said.**  
18 Q. Do you think it's fair for a high school kid who's  
19 gay and who wants to attend on-campus PSEO courses  
20 at Northwestern to sign a statement saying that  
21 their sexual identity is immoral and a sin?  
22 **MR. FLESHMAN:** Objection; lacks  
23 foundation. You can answer.  
24 **A. I think, as I stated before, that my world view,**  
25 **which I believe is shared by the institutions we're**

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1 **talking about, Crown and Northwestern, is that our**  
2 **identity is not in our actions but our identity is**  
3 **in Christ as sinners redeemed by the blood of**  
4 **Christ, and that is what's more important than**  
5 **anything else.**  
6 Q. But my question was a little bit different.  
7 **MR. TIMMERMAN:** Could you read it  
8 back for us. Sorry.  
9 (Last question read back)  
10 **A. I'm not familiar with what that statement says.**  
11 Q. You're not familiar with what?  
12 **A. Are you saying that Northwestern or Crown has a**  
13 **statement that says that?**  
14 Q. Yes.  
15 **A. I'm not familiar with the statement.**  
16 Q. Well, assuming that Northwestern does have a  
17 statement that says that, do you think it would be  
18 fair for a gay student to have to do that?  
19 **MR. FLESHMAN:** Objection; lacks  
20 foundation.  
21 **A. My understanding is that Crown and Northwestern**  
22 **share the same understanding as I do of scripture,**  
23 **and sexual identity is not a sin. There is a**  
24 **difference between actions that are done and**  
25 **temptations that are -- you know, actively sitting**

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1 **and passively being tempted. Even Jesus was**  
2 **tempted, but he did not sin. So we may all have**  
3 **struggles or challenges with things, proclivities**  
4 **to sin in different ways, but all students that**  
5 **attend Crown and Northwestern are pursuing the**  
6 **model of Christ.**  
7 **And so to ask students to join**  
8 **together in supporting one another in an environment**  
9 **where they're in pursuit of Christ and following**  
10 **his commands and his teachings and becoming more**  
11 **Christ like, I think is a good goal to have for the**  
12 **students.**  
13 Q. Okay. But again that was not my question.  
14 **A. I'm sorry. I'm not following your question very**  
15 **well.**  
16 Q. My question was, do you think it's fair for a kid  
17 who's gay, who wants to attend Northwestern for  
18 PSEO, to have to sign a statement saying that their  
19 sexual identity is a sin and immoral?  
20 **A. Okay.**  
21 **MR. FLESHMAN:** Objection; lacks  
22 foundation.  
23 **A. So when you -- what are you saying when you say who**  
24 **is gay? This is where I think we're missing each**  
25 **other.**



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1 Q. Whose sexual orientation is gay.  
2 **A. Right.**  
3 Q. Who is born gay.  
4 **A. Again, my world view is just different than yours.**  
5 Q. You don't believe people are born gay?  
6 **A. I think we're all born sinners.**  
7 Q. Do you believe people are born gay?  
8 **A. I think that's a complicated issue that I don't --**  
9 **I'm not a scientist or have any research backing to**  
10 **know the answer to that question.**  
11 Q. Do you have a belief one way or the other?  
12 **A. Well, I think there's some genetically -- I'll say**  
13 **alcoholism; correct?**  
14 Q. Between being gay and having --  
15 **A. No. I'm just saying I think that we have --**  
16 **research does support there are genetic things to**  
17 **being an alcoholic, but as someone who is in pursuit**  
18 **of Christ, I would push aside -- you know, I would**  
19 **work to not follow those tendencies, to not fall**  
20 **into those temptations towards sin. And so if**  
21 **you're saying that someone is born of a tendency**  
22 **towards sin, we are all born towards a tendency**  
23 **towards sin.**  
24 Q. So you equate being gay with being an alcoholic?  
25 **A. That's not what I said.**

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1 Q. That's the analogy you just said.  
2 **MR. FLESHMAN:** Objection to the  
3 extent it mischaracterizes her testimony.  
4 **A. Okay. I'm trying to explain that I believe we are**  
5 **all sinners. We are all born with a tendency**  
6 **towards sin. It's part of the broken world we live**  
7 **in since the fall. And now we live in a broken**  
8 **world and so we are all born with a tendency towards**  
9 **sin. Some people are born with different tendencies**  
10 **than others.**  
11 Q. I think hear what you're saying. You believe it's  
12 okay to be gay so long as you don't act on it?  
13 **MR. FLESHMAN:** Objection to the extent  
14 it mischaracterizes her testimony, but you can  
15 clarify.  
16 **A. Okay. I believe that there is a difference between**  
17 **actively sinning and passively being tempted to sin.**  
18 Q. And actively sinning, in your belief, is to be  
19 having a same sex relationship?  
20 **A. For that particular -- Yes. Just as I would say**  
21 **having a heterosexual sexual relationship outside**  
22 **of marriage would also be sin.**  
23 Q. Even dating?  
24 **A. No. Actually having sexual relations outside of**  
25 **marriage.**

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1 Q. Do you think that same sex individuals dating each  
2 other would be sin?  
3 **A. I believe pursuing sin is sin.**  
4 Q. So how would that be pursuing sin?  
5 **A. Because God has ordained marriage as between male**  
6 **and female.**  
7 Q. So having a same sex relationship would be pursuing  
8 sin in your viewpoint?  
9 **A. Yes.**  
10 Q. Would having a heterosexual relationship and not  
11 having sexual intercourse be being pursuing sin for  
12 you?  
13 **A. No. God has designed marriage between male and**  
14 **female. It is his design for humans and it's the**  
15 **best for human flourishing.**  
16 Q. Are you aware of what Crown's or Northwestern's  
17 faith statements or covenants or declarations say  
18 about gender identity?  
19 **A. No. I'm not completely familiar with that, no.**  
20 Q. Are you aware that Northwestern's declaration of  
21 Christian community refers to individuals who have  
22 a different gender identity than their biological  
23 identity as being, and I quote here, broken and  
24 confused?  
25 **MR. FLESHMAN:** Objection to the

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1 extent -- or it lacks foundation. If you're going  
2 to quote from a document, you need to let her look  
3 at it.  
4 **MR. TIMMERMAN:** I'm just asking if  
5 she's aware.  
6 **A. I haven't read it.**  
7 Q. Okay. Did G.L. or J.L. or R.L. during their time  
8 at Crown and Northwestern, were they ever required  
9 to attend a religious gathering or chapel or things  
10 of that nature?  
11 **A. Not that I'm aware of.**  
12 Q. Were they ever encouraged; do you know?  
13 **A. Not that I'm aware of.**  
14 Q. You would agree, I think, that your kids could go  
15 to a different PSEO school for PSEO and still be  
16 Christian; right?  
17 **A. Yes, they could.**  
18 Q. Still hold their same Christian beliefs; correct?  
19 **A. It would not be the same, but yes. It would not be**  
20 **the same environment but, yes, they would still be**  
21 **Christians.**  
22 Q. Their beliefs would be the same; correct?  
23 **A. Yes.**  
24 Q. So not being able to attend Crown or Northwestern  
25 wouldn't have any impact on their beliefs; it would

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1 just have an impact on the environment they're  
2 attending. Correct?  
3 **A. It would impact the environment and, I mean,**  
4 **environments are influential, so it could impact**  
5 **their beliefs. I don't know.**  
6 Q. Any reason to believe that any of your children  
7 couldn't still exercise their religious practice in  
8 faith if they went to a different PSEO school?  
9 **A. It would be a different experience.**  
10 Q. Any reason to believe they couldn't still exercise  
11 their faith and religious practices?  
12 **A. In what way?**  
13 Q. In any way.  
14 **A. Well, I'm not sure. Like what -- Like would they**  
15 **not be able to pray anymore? Is that what you're**  
16 **asking? Like what exactly are you asking?**  
17 Q. Yeah. I'm asking, would it impact their ability to  
18 live their faith or practice their religion?  
19 **A. I don't know.**  
20 Q. If Crown and Northwestern dropped their faith  
21 statement and instead requested that students sign  
22 the faith statement but didn't require it, would  
23 you be comfortable sending your kids to Crown and  
24 Northwestern for PSEO still?  
25 **A. We would have to consider it. We would prayerfully**

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1 **consider it and decide.**  
2 Q. Do you believe that the amendment that's been  
3 proposed for the change to the PSEO law in any way  
4 impacts your children's right to exercise their  
5 religion?  
6 **MR. FLESHMAN:** Objection to the extent  
7 it calls for a legal conclusion. You can answer if  
8 you have an opinion.  
9 **A. I think, as I stated before, yes, I do.**  
10 Q. How so?  
11 **A. Because they can no longer go to the institution of**  
12 **their choosing if Crown and Northwestern drop their**  
13 **PSEO programs.**  
14 Q. Any other way?  
15 **A. I'm sorry. Any other way what? Sorry. I'm getting**  
16 **tired.**  
17 Q. That's okay. Any other way that you believe it  
18 would impact your children's right to practice their  
19 religion?  
20 **A. I'm not sure.**  
21 Q. Okay. Would you like to take another break?  
22 **A. I would like to take another break. Thank you.**  
23 **MR. TIMMERMAN:** We can take another  
24 break. This is not a marathon so.  
25 (Recess taken from 2:50 p.m. to

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1 3:06 p.m.)  
2 **BY MR. TIMMERMAN:**  
3 Q. You testified earlier that J.L. and R.L. have done  
4 online PSEO; correct?  
5 **A. Yes.**  
6 Q. Are you aware of whether there's a faith statement  
7 required for online PSEO?  
8 **A. I've heard that there's not.**  
9 Q. Okay. If there's not, and I'll represent that  
10 there's not, do you have any issue with R.L. and  
11 J.L. attending online PSEO?  
12 **A. No. I don't understand why there's not, but --**  
13 Q. You wish that there were?  
14 **A. I wouldn't have a problem with that.**  
15 Q. Do you have any idea why the schools decided not to  
16 require a faith statement for online?  
17 **A. You would have to ask the schools.**  
18 Q. Okay. Do you recall when you last reviewed or saw  
19 Crown and Northwestern's faith statements and  
20 covenants?  
21 **A. Ugh-ugh. No, I don't remember if I looked last year**  
22 **when the legislation was happening or not. It was**  
23 **just part of the process. Yeah, I don't remember.**  
24 Q. Do you know if it was something that you reviewed  
25 before you testified before the legislature?

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1 **A. I don't -- I don't recall. I mean, I reviewed the**  
2 **changes in the law a lot. I don't recall.**  
3 Q. What changes in the law do you take issue with?  
4 What is it about the amendment that you take issue  
5 with?  
6 **A. They are saying that schools -- Well, actually can**  
7 **I see -- can I see the law again? It's been a while**  
8 **since I've looked at it.**  
9 Q. Yeah.  
10 **MR. TIMMERMAN:** We can just mark this  
11 as Exhibit 1.  
12 (Exhibit No. 1 marked for  
13 identification)  
14 **BY MR. TIMMERMAN:**  
15 Q. And this is the Complaint from the lawsuit. I  
16 think you signed this on the last page. Second --  
17 Maybe not. Page 37 maybe.  
18 **A. Yes, I did.**  
19 Q. Thirty-six.  
20 **A. I just don't recall the exact wording at this**  
21 **moment.**  
22 Q. Okay. Yeah. Is that your signature on Page 36?  
23 **A. Yes, it is.**  
24 Q. Okay. Did you review this document before you  
25 signed it?

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1 **A. Yes, I did.**  
2 Q. Okay. Could you turn to Page 7.  
3 **A. Yes.**  
4 Q. In Paragraph 41 there, No. 41, I believe that sets  
5 forth the text of the law, and I'll just -- I'll  
6 just read it for the record. "An eligible  
7 institution must not require a faith statement from  
8 a secondary student seeking to enroll in a  
9 postsecondary course under this section during the  
10 application process or base any part of the  
11 admission decision on a student's race, creed,  
12 ethnicity, disability, gender, or sexual orientation  
13 or religious beliefs or affiliations."  
14 Did I read that correctly?  
15 **A. Yes. Thank you for refreshing my memory.**  
16 Q. For sure. Yeah. What -- what part of this law do  
17 you take issue with?  
18 **A. I take issue with the change that an eligible**  
19 **institution must not require a faith statement from**  
20 **a secondary student seeking to enroll in a**  
21 **postsecondary course because, as Representative**  
22 **Pryor testified, they were targeting the specific**  
23 **faith that Northwestern and Crown share.**  
24 Q. Are you aware of any other postsecondary PSEO  
25 institutions that require a faith statement?

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1 **A. I'm not certain. I think there might be a couple,**  
2 **but I'm not sure.**  
3 Q. Any other language in this statute that you take  
4 issue with?  
5 **MR. FLESHMAN:** Objection to the extent  
6 it calls for a legal conclusion. You can answer if  
7 you have an opinion.  
8 **A. I don't have an opinion.**  
9 Q. No opinion about the rest?  
10 **A. Well, I think the religious beliefs or affiliations,**  
11 **I think the secondary -- postsecondary institutions**  
12 **have the ability to select based on that.**  
13 Q. So you believe that postsecondary institutions  
14 should be able to base admissions decisions on  
15 religious beliefs or affiliations?  
16 **MR. FLESHMAN:** Objection to the extent  
17 it calls for a legal conclusion. You can answer if  
18 you have an opinion.  
19 **A. Well, yes, I do.**  
20 Q. Even though it's public taxpayer dollars?  
21 **MR. FLESHMAN:** Objection; lacks  
22 foundation.  
23 **A. Public taxpayer dollars are the students' dollars,**  
24 **and I believe the Supreme Court has recently and**  
25 **repeatedly said that students have a right to take**

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1 **publicly available dollars and bring it to the**  
2 **institution of their choice. So, yes, they do.**  
3 Q. You're not a lawyer, though; correct?  
4 **A. No, I'm not.**  
5 Q. And you testified earlier that the money is not  
6 coming to the students, it's going to the  
7 postsecondary institution; correct?  
8 **A. The money is not paid to the student, but it is the**  
9 **students' money that they can direct to the**  
10 **institution, as I understand it.**  
11 **MR. FLESHMAN:** I'm just going to  
12 object to the extent it calls for a legal conclusion  
13 about the money.  
14 Q. Yeah. Why -- why is it the students' money in your  
15 judgment?  
16 **MR. FLESHMAN:** Same objection.  
17 **A. It's available for the PSEO program.**  
18 Q. Okay. If a PSEO program required a statement of  
19 Islamic belief, would that be okay with you?  
20 **A. Yes.**  
21 Q. What if it was right next to your house and the  
22 most convenient PSEO option?  
23 **A. I would be happy if there are other options for me**  
24 **to go to, you know, and thankfully there is in**  
25 **Northwestern and Crown, and we travel a great**

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1 **distance to go to those colleges.**  
2 Q. Aside from Northwestern -- I think I just asked  
3 this, but you don't know the answer. You're not  
4 aware of any other schools that require faith  
5 statements other than these two; correct?  
6 **A. No. I mean, I thought there were others. I'm not**  
7 **certain.**  
8 Q. Okay. What if there was only one PSEO provider in  
9 Minnesota and it required an Islamic faith statement  
10 for its mission, would you be okay with that?  
11 **A. I'm sorry. One more time.**  
12 Q. What if there is only one PSEO provider in  
13 Minnesota, and to gain admission you had to profess  
14 your faith in Islam. Would you be okay with that?  
15 **A. We wouldn't participate.**  
16 Q. So you just would choose not to do it?  
17 **A. Correct.**  
18 Q. Even though your children would have no other  
19 options?  
20 **A. It wouldn't be an option we would use.**  
21 Q. And why is that?  
22 **A. Because we wouldn't profess faith in Islam.**  
23 Q. Because you don't believe in Islam; correct?  
24 **A. Correct.**  
25 Q. Do you expect that all of the children, high school

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1 kids, who attend PSEO classes on campus with your  
2 children share the same religious beliefs?  
3 **A. I'm sorry. Which institution?**  
4 Q. At Crown and Northwestern.  
5 **A. To the extent in which they were honest when they**  
6 **signed the faith statement, yes.**  
7 Q. Are you aware of anyone ever lying on the faith  
8 statement?  
9 **A. I would have no idea.**  
10 Q. So is it fair to say that what the -- what the  
11 amendment to the law would prohibit is your  
12 children's ability to attend a school that has  
13 filtered out all non-Christians; correct?  
14 **MR. FLESHMAN:** Objection to the extent  
15 it calls for a legal conclusion. You can answer if  
16 you know.  
17 **A. I don't know. I'm not in charge of the admissions**  
18 **for Crown and Northwestern.**  
19 Q. Okay. Have you ever had any discussions with anyone  
20 at Crown or Northwestern about why they don't  
21 require a faith statement for online students?  
22 **A. No, I have not.**  
23 Q. Have you ever heard why they don't?  
24 **A. Ugh-ugh.**  
25 Q. I'm sorry. That was a no?

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1 **A. I'm sorry. No.**  
2 Q. Why would you prefer that they do require a faith  
3 statement for online students?  
4 **A. Well, as I think you said before, that, you know,**  
5 **the education of our children and the environment**  
6 **of the children -- that our children are being**  
7 **educated in is important to us. I don't understand**  
8 **why they don't require it for both.**  
9 Q. Is it your understanding that Crown and Northwestern  
10 could continue to offer online PSEO courses if this  
11 law is upheld?  
12 **MR. FLESHMAN:** Objection to the extent  
13 it calls for a legal conclusion.  
14 **A. As I understand the legality of it, as long as they**  
15 **didn't require a faith statement for the online**  
16 **program, then yes.**  
17 Q. But I think we've -- you testified earlier, online  
18 and in person is just not the same; right?  
19 **A. Correct. It's not the same.**  
20 Q. There are a lot of benefits to in person that you  
21 don't get online; correct?  
22 **A. Yes.**  
23 Q. And that would include things like the ability to  
24 engage in discussions with your fellow students;  
25 correct?

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1 **A. In a different way than online, yes.**  
2 Q. And to use resources like the library; correct?  
3 **A. Yes.**  
4 Q. And asking your teacher questions in realtime;  
5 correct?  
6 **A. Those are benefits of being in person.**  
7 Q. In fact, there's also a community benefit, wouldn't  
8 you agree?  
9 **A. I'm sorry?**  
10 Q. There's also a community benefit, wouldn't you  
11 agree?  
12 **A. Right.**  
13 Q. Has R.L. applied to any other PSEO programs while --  
14 since this law has been amended?  
15 **A. No.**  
16 Q. Is that something -- I think I said you would  
17 consider but you'd have discussions about?  
18 **A. We would -- we'd prayerfully consider everything.**  
19 **It would be in that same vein. We'd consider**  
20 **different options.**  
21 Q. What is R.L.'s high school GPA at this point?  
22 **A. It's a 4.0.**  
23 Q. So suffice to say that she would not have an  
24 academic barrier probably from getting into other  
25 PSEO institutions?

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1 **A. No. I testified as such.**  
2 Q. And what about J.L. and G.L., what were their GPAs  
3 when they were in PSEO?  
4 **A. I believe they were 4.0 or very close to that.**  
5 Q. So same for them, they would not have had an  
6 academic barrier to other programs?  
7 **A. Correct.**  
8 Q. Have you ever sat back and considered the laws or  
9 the schools' admissions policies, and by the schools  
10 I mean Crown and Northwestern's, impact on kids who  
11 don't have the means to go someplace else?  
12 **A. Yes, actually. Because if Crown and Northwestern**  
13 **were to close down their PSEO programs because the**  
14 **state has forced them to not require a faith**  
15 **statement, then students like my children, who**  
16 **would prefer to go to Northwestern and Crown, would**  
17 **perhaps have to go to, say, the University of**  
18 **Minnesota. And as I stated, I think there would**  
19 **not be an academic barrier to them getting in, and**  
20 **I think it would be a pretty likelihood -- it would**  
21 **be fairly likely for, say, R.L. or O.L. to get into**  
22 **the University of Minnesota, and then they would**  
23 **actually be taking a spot away from a student who**  
24 **would be maybe living close to the University of**  
25 **Minnesota and then they wouldn't be able to get in.**



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1 Q. What about from the perspective of kids -- Crown  
2 is in St. Bonifacius; correct?  
3 **A. Um-uhm.**  
4 Q. Do you know of any other PSEO providers in  
5 St. Bonifacius?  
6 **A. I don't know of any.**  
7 Q. Do you know where the next closest PSEO provider is?  
8 **A. I'm not sure, but as I understand it, there are a**  
9 **lot of areas in the state that don't have PSEO near**  
10 **to them. Is that correct?**  
11 Q. I mean, I think there is some provision in the law  
12 for what happens when that occurs, yeah, but have  
13 you ever sat back and thought about it from the  
14 perspective of a kid who lives in St. Bonifacius  
15 but for whatever reason - their beliefs, their  
16 sexuality, their gender identity, can't or won't  
17 sign a faith statement, the impact that that has on  
18 those students?  
19 **A. I think it would be -- I mean, it would be**  
20 **similar -- the same impact, you know, that would**  
21 **happen -- I just have to get my thoughts straight**  
22 **here. I think that, you know, because my children**  
23 **decided to go to, say, Northwestern, R.L. drives**  
24 **45 minutes to get there and it's something we**  
25 **sacrifice and make it work and happen so she can go**

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1 **to the school of her choosing.**  
2 **And so I think that students ought to**  
3 **go to a school that suits them well, and so for a**  
4 **student that for those reasons wouldn't feel**  
5 **comfortable signing the faith statement at Crown,**  
6 **it would be -- it's a kindness to them that they**  
7 **know what they're getting into. So there is a**  
8 **faith statement so they know what would be expected**  
9 **of them to go there so they can choose to go to a**  
10 **different school.**  
11 Q. But if it isn't really a choice -- I mean, you have  
12 a loving and supportive family by all means, and you  
13 have the means to transport your children 45 minutes  
14 to PSEO, but what about kids who don't --  
15 **A. Well --**  
16 **MR. FLESHMAN:** Finish your question.  
17 Q. Yeah. I'm going to ask a question. What about kids  
18 living in St. Bonifacius who can't or won't sign a  
19 faith statement but don't have the means to travel  
20 to the Twin Cities for PSEO? Have you thought  
21 about their situations?  
22 **A. Well, they --**  
23 **MR. FLESHMAN:** Objection to the  
24 relevance of this.  
25 **THE WITNESS:** Thank you.

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1 **MR. FLESHMAN:** What's the point of  
2 asking her what her opinion is about those things?  
3 Q. You can answer.  
4 **A. Well, I think there are a lot of online options for**  
5 **those students.**  
6 Q. But you just told me that online is different;  
7 right? And it's not as good?  
8 **A. It is different, but we all make choices and we all**  
9 **have, you know, things that we have to do that**  
10 **aren't the best choice for us.**  
11 Q. So your right to choose, your kids' right to choose  
12 is more important than most kids' right to choose?  
13 **MR. FLESHMAN:** Objection. This is  
14 getting argumentative.  
15 **THE WITNESS:** Thank you.  
16 Q. Is that your position?  
17 **A. I've said that before, that I do not think my kids'**  
18 **right to choose is more important than anyone else's**  
19 **right to choose. I've said that before.**  
20 Q. Do you believe that God only creates people with  
21 two distinct gender identities?  
22 **A. I think God originally created male and female and**  
23 **sin has entered the world and we have situations**  
24 **that are not the way he originally designed.**  
25 Q. So you think that gender identity different than

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1 your biological gender is sin?  
2 **MR. FLESHMAN:** Objection to the extent  
3 that it mischaracterizes the testimony. You may  
4 answer.  
5 **A. Thank you. I think there's a lot of nuances here,**  
6 **and I'm not fully versed in all the nuances of**  
7 **gender and gender identity.**  
8 Q. So you can't answer that question?  
9 **A. Repeat the question.**  
10 Q. Yeah. So you think that a gender identity that's  
11 different than your biological gender is sin?  
12 **A. I think I'll go back to what I said before. I**  
13 **think we have differences in identity, and I don't**  
14 **consider identity to be something -- anything other**  
15 **than the fact that I am a human who is a sinner.**  
16 **Like that is identity to me.**  
17 Q. Okay. Are you familiar with gender dysphoria?  
18 **A. I've heard the term.**  
19 Q. Do you know what it is?  
20 **A. I believe it's a feeling of being uncomfortable in,**  
21 **I guess, your biological -- Say again. I'm not**  
22 **sure I can explain it well. A discomfort with your**  
23 **biological body, probably is the best way to**  
24 **describe it.**  
25 Q. Do you know anyone who experiences that? Have you



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1 ever met anyone who experiences that?  
2 **A. I've met people but I don't know of anyone.**  
3 Q. Have you talked to them about that?  
4 **A. Ugh-ugh.**  
5 **MR. FLESHMAN:** Verbal answers.  
6 **A. I'm sorry. No.**  
7 Q. Have you ever felt that your faith was attacked?  
8 **A. Ugh-ugh.**  
9 **MR. FLESHMAN:** Objection; vague.  
10 **A. Yeah. You'll have to explain more.**  
11 Q. Do you ever feel like you were personally attacked  
12 by someone else because of your faith?  
13 **MR. FLESHMAN:** Objection; vague.  
14 **A. In what way would they be personally attacking me?**  
15 Q. Words?  
16 **A. Like what kind of words? Like just disagreeing**  
17 **with my faith?**  
18 Q. Belittling you, making you feel less, minimizing  
19 your beliefs.  
20 **A. The lawsuit right now.**  
21 Q. Well, it's not -- I apologize for that because  
22 it's not my intent at all. Aside from today, have  
23 you felt that at all?  
24 **A. No.**  
25 Q. Okay. And I have -- I don't normally like to ask

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1 people about their beliefs but I have to for today.  
2 **A. Okay.**  
3 Q. So please know that I realize the impact it may  
4 have, but that is not my intent in asking you these  
5 questions. So I hope you do realize that and  
6 understand that. I can tell you that's true.  
7 Are you concerned that the community  
8 of Crown and Northwestern will be somehow changed  
9 if non-Christian students are allowed to attend on  
10 campus?  
11 **MR. FLESHMAN:** Objection; vague.  
12 **A. I can only speculate on how it could change. I**  
13 **don't know.**  
14 Q. Is it the same for gay students or transgender  
15 students, you can only speculate?  
16 **MR. FLESHMAN:** Same objection.  
17 **A. Is what the same?**  
18 Q. The impact on the culture or the community at the  
19 schools.  
20 **A. Right. I would -- I would only be able to**  
21 **speculate. You're asking me about something that**  
22 **hasn't happened so.**  
23 Q. Is that a concern of yours?  
24 **A. (Shakes head.)**  
25 **MR. FLESHMAN:** Objection; vague.

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1 **COURT REPORTER:** Excuse me, ma'am.  
2 You need to answer out loud. You just shook your  
3 head.  
4 **THE WITNESS:** Oh, I wasn't answering  
5 anything.  
6 Q. To your knowledge have any of your children ever  
7 been discriminated against?  
8 **MR. FLESHMAN:** Objection to the extent  
9 it calls for a legal conclusion.  
10 **A. Yeah, I'm not sure. Not to my knowledge.**  
11 **MR. TIMMERMAN:** Do you want to take  
12 five minutes and then we can wrap up?  
13 **MR. FLESHMAN:** Sure.  
14 (Recess taken from 3:32 p.m. to  
15 3:39 p.m.)  
16 **BY MR. TIMMERMAN:**  
17 Q. I just have a couple more questions. I wanted to  
18 show you a couple more documents here.  
19 (Exhibit No. 2 marked for  
20 identification)  
21 Q. Please take a moment to review it.  
22 **A. (Reviews Exhibit No. 2.)**  
23 Q. Have you had a chance to review it?  
24 **A. I have. Um-uhm.**  
25 Q. And did you write this?

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1 **A. I did not.**  
2 Q. Do you know who did?  
3 **A. Well, as I recall, all of these people, my name is**  
4 **on here, my daughter's name is on here, we all**  
5 **submitted letters with this general idea of opposing**  
6 **the changes to the law, but instead of accepting**  
7 **our individual letters, this is what they presented**  
8 **to the committee.**  
9 Q. Okay. When you say they presented to the committee,  
10 who do you mean?  
11 **A. Whoever took all our letters and truncated them or**  
12 **summarized them in this way.**  
13 Q. Was it someone from Crown or Northwestern; do you  
14 know?  
15 **A. No, it was legislature.**  
16 Q. Okay. And did you provide any handouts at any  
17 legislative meetings?  
18 **A. No. I mean, I submitted -- so I had not been**  
19 **involved in the legislative process before outside**  
20 **of voting.**  
21 Q. Me either so.  
22 **A. So this is all new to me, and the process of getting**  
23 **involved in the legislative process was frankly**  
24 **very frustrating and very opaque. And so letters**  
25 **were submitted, and I was under the understanding**

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1 that a letter was submitted as written testimony,  
2 but this is what, in one instance, what happened,  
3 is that this was given to the committee instead of  
4 the individual letters submitted by the individual  
5 people.  
6 Q. Got it. So someone at the legislature created a  
7 summary of some type?  
8 A. Exactly. Um-uhm.  
9 Q. Did anyone at Crown or Northwestern give you any  
10 instructions on what to write to the legislature?  
11 A. Ugh-ugh. No.  
12 Q. Did anyone at Crown or Northwestern request that  
13 people contact the legislature or write to the  
14 legislature?  
15 A. I don't know. This was -- My involvement in this  
16 came from myself and my reading of the bill.  
17 Q. Okay.  
18 A. You know, that's -- that's why I got involved. It  
19 wasn't because of Northwestern or Crown asking me  
20 to do anything.  
21 (Exhibit No. 3 marked for  
22 identification).  
23 A. (Reviews Exhibit No. 3.)  
24 Q. I show you what's been marked as Exhibit 3,  
25 Mrs. Loe, and it looks like a document that your

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1 lawyers provided to us. It looks like a cellphone,  
2 I'm guessing, by the battery and the bars at the  
3 top; right? It looks like a cellphone snap. Is  
4 this something that you gave to your lawyers?  
5 A. No.  
6 Q. Who is -- so this is from the taking -- it looks to  
7 be from the Taking Action for PSEO Facebook group;  
8 correct?  
9 A. It appears to be, yes.  
10 Q. Do you know Sarah -- I'm going to absolutely  
11 butcher that name -- Bokenewicz?  
12 A. I know her. I don't know how to pronounce her last  
13 name either.  
14 Q. Okay. That's some consolation. Was she also a  
15 moderator for the Facebook site?  
16 A. She was.  
17 Q. And who is John Miller?  
18 A. I don't know. I mean, he's the name on the page  
19 there, but I don't know him.  
20 Q. Okay. And in a response to John Miller's comment,  
21 it looks like you have written: Sadly, Bethel  
22 stopped requiring a faith statement for PSEO prior  
23 to this becoming an issue. Did you consider that --  
24 I guess why did you use the word sadly? Was that  
25 unfortunate to you?

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1 A. Yes, it was unfortunate to me.  
2 Q. And why is that?  
3 A. As a Bethel alum, I have not been happy with the  
4 direction Bethel has taken with their school for  
5 quite a while.  
6 Q. How so?  
7 A. I believe they are moving away from a strong  
8 biblically-based foundation.  
9 Q. And part of that moving away is eliminating the  
10 faith statement requirement?  
11 A. Yes. I would view that as being more capitulating  
12 to the world.  
13 Q. Do you know what they're moving towards?  
14 A. I think I just answered that.  
15 Q. Capitulating to the world?  
16 A. Yes.  
17 Q. I guess my last question for you is -- actually a  
18 couple. In your belief do you feel like the  
19 legislature is only concerned about protecting  
20 individuals who aren't Christian?  
21 MR. FLESHMAN: Objection; calls for  
22 speculation. You can answer if you have an  
23 opinion.  
24 A. I'm sorry. Ask the question one more time, please.  
25 Q. Yeah. Is it your belief, do you believe that the

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1 legislature is only concerned about protecting  
2 non-Christians?  
3 A. It certainly appears that they are biased away from  
4 Christians in this instance.  
5 Q. Is it -- And we've looked at the PSEO law change  
6 today. Have you considered the possibility that  
7 the legislature may have been trying to protect some  
8 groups of people too?  
9 MR. FLESHMAN: Objection to the -- it  
10 calls for speculation.  
11 A. I understand that that's what some people view it  
12 as, but I think there's definitely an opposing  
13 viewpoint in contrast to that.  
14 Q. You see it as the opposing viewpoint; correct?  
15 A. I believe that the legislature is interfering with  
16 my children's rights to religious freedom in this  
17 instance.  
18 Q. By attending a PSEO school that provides a Christian  
19 education?  
20 A. By preventing them from doing so.  
21 Q. From going to a PSEO school that provides a  
22 Christian education?  
23 A. Yes.  
24 MR. TIMMERMAN: No further questions.  
25 MR. FLESHMAN: We'll review and sign.

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1 I don't have any questions.  
2  
3 (Deposition concluded at 3:48 p.m.)  
4 \* \* \*  
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1 STATE OF MINNESOTA)  
2 COUNTY OF HENNEPIN)  
3 BE IT KNOWN, that I took the deposition of  
4 MELINDA LOE at the time and place set forth herein;  
5 That I was then and there a Notary Public  
6 in and for the County of Hennepin, State of Minnesota,  
7 and by virtue thereof I was duly authorized to  
8 Administer an oath;  
9 That the witness before testifying was by  
10 me first duly sworn to testify to the whole truth  
11 relative to said cause;  
12 That the testimony of said witness was  
13 recorded in shorthand and transcribed into typewriting,  
14 that the deposition is a true record of the testimony  
15 given by the witness, to the best of my ability;  
16 That I am not related to any of the parties  
17 hereto nor interested in the outcome of the action;  
18 That the reading and signing of the  
19 deposition by the witness was not waived and the Notice  
20 of Filing was not waived;  
21 That the original transcript was charged  
22 and delivered to the attorney conducting the deposition  
23 for filing, that copies were charged at the same rate to  
24 respective counsel;  
25 IN EVIDENCE HEREOF, WITNESS MY HAND AND  
SEAL THIS 17TH DAY OF FEBRUARY 2024.  
  
\_\_\_\_\_  
Jacquelyn M. Young

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1 READING & SIGNING CERTIFICATE  
2 (Crown College, et al, vs MN Dept. Of Education)  
3  
4 BE IT KNOWN, that I, the undersigned  
5 Deponent, have on this date, \_\_\_\_\_, read  
6 the transcript of my deposition testimony, noting the  
7 following changes (if any):  
8  
9 \_\_\_\_\_  
10 MELINDA LOE  
11  
12 Page & Line No. Correction Reason  
13 \_\_\_\_\_  
14 \_\_\_\_\_  
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Willie Jett, et al

Melinda Loe  
2-9-24

MELINDA LOE  
February 9, 2024

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